



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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March 20, 2007



REPLY TO THE ATTENTION OF:

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7001-0320-0006-1447-1943 322-07

SR-6J

Mr. Robert W. Wilhelm II
Vice President/Senior Hydrogeologist
Haley & Aldrich, Inc.
44808 Helm Street
Plymouth, Michigan 48170

RE: U.S. EPA Comments on Draft Framework for a Human Health Risk Assessment at the North Bronson Former Facilities Site – Former Scott Fetzer Facility OU (B5Y1-03) - Docket No. V-W-02-C-700

Dear Mr. Wilhelm:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the draft framework for a Human Health Risk Assessment (HHRA) at the Scott Fetzer Operable Unit of the North Bronson Former Facilities Site. U.S. EPA discussed the document with Haley & Aldrich representatives on March 9, 2007. U.S. EPA's comments are, as follows:

GENERAL:

1. Baseline HHRA's should be consistent with U.S. EPA guidance. Such guidance should include, but not be limited to, RAGS - Parts A, B, C, D, and E (USEPA 1989, 1991, 1991, 1998, 2004), Calculating Upper Confidence Limits for Exposure Concentration at Hazardous Waste Sites (USEPA 2002a), Exposure Factors Handbook (USEPA 1997b) and the OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway (USEPA November, 2002). Please revise the general approach of the HHRA and update references.
2. The HHRA is used to quantitatively and qualitatively describe potential cancer risks and noncancer hazards associated with CURRENT and FUTURE human exposure to Site-related chemicals. The HHRA evaluates cumulative risks irrespective of the sources of the various chemicals in environmental media and irrespective of any anticipated remedial actions or institutional controls.
3. Besides the Introduction, Site Characterization, Conclusions and References, the HHRA should have four basic components: a) hazard identification; b) exposure assessment; c) toxicity assessment; and d) risk characterization. The risk characterization section estimates the cancer risks and noncancer hazards for each exposure pathway and population. It is here that uncertainties, limitations and assumptions inherent in the risk assessment process for the site should be noted and talked about.

4. To be consistent, U.S. EPA equations and toxicity values should be used throughout the risk assessment. The Michigan Department of Environmental Quality (MDEQ) standards and values are mentioned throughout the draft conceptual model. While the MDEQ Part 201 criteria are very useful for preparation of the FS, they are not to be used to screen out areas and actions in the RI. Once risk assessment exposure scenarios are developed, the Part 201 criteria can be evaluated to ensure that chemical-specific ARARs are sufficiently protective.

Specific Comments:

5. Page 2, Potential Future Site Uses - Since there are homes adjacent to the former Scott Fetzer facility, U.S. EPA does not feel that it is appropriate to eliminate the possibility of future residential use. Therefore, residential and recreational uses should be looked at for both the Plant #1 property and the Annex/CDF.

6. Pages 3-4, Potential Exposure Points and Exposure Media - Why is surface soil not included?

7. Page 4, Potential Routes of Exposure - As part of the residential future use scenario, it should be assumed that a private well will be placed at the site, with groundwater used as drinking water.

8. Page 4, Potential Routes of Exposure - Gardening would be a realistic activity under a residential future use scenario. However, as it is clear that the residential use scenario will result in carcinogenic risks significantly above 1×10^{-4} , it is acceptable to streamline the assessment and address gardening in a qualitative manner (i.e., note that it would further increase exposure and risks).

9. Pages 4-5, Potential Human Receptors - For all current and future use scenarios, the risk assessment should assume that there are no engineering barriers or institutional controls to limit contact with site contamination.

10. Pages 4-5, Potential Human Receptors - A recreational use scenario should be added.

11. Pages 6-10, Human Health and Water Quality Protection Evaluation - As noted above, MDEQ ARARs should not be used to screen out contaminants and property areas to be evaluated under the risk assessment. U.S. EPA makes risk management decisions in the Record of Decision (ROD) after review of the RI and FS reports. Making assumptions about appropriate ARARs and using those ARARs to screen out sources of risk would, at this stage in the review, be improper as it would inherently be considered decision-making.

12. Page 9, Second Tier Evaluation - U.S. EPA uses the risk range to evaluate risks. It would be unusual for a remedial cleanup to target a 1×10^{-4} cleanup standard. The risk assessment should note the risk range and should not select a risk endpoint.

13. Table 1 - Include potable use of groundwater. Also include showering, dish washing, etc.

14. Table 2 - Include on-site residential and recreational users. For residential future use, assume potable use of groundwater.

15. Table 3 – For industrial sewer, evaluate contaminants within pipes. Also make sure HHRA notes if material is a source of contamination to groundwater.

16. Figures 2- 4 – Adjust as appropriate to respond to comments.

U.S. EPA has selected SulTRAC, Inc. to serve as the oversight contractor for the North Bronson Former Facilities Site. SulTRAC is a joint venture between Sullivan International Group and TetraTech, Inc. The SulTRAC project coordinator for the site will be Ms. Jennifer Knoepfle. Please copy her on all NBFF correspondence to U.S. EPA. In addition, please provide two copies of technical deliverables to SulTRAC for technical review.

Jennifer Lawson Knoepfle, PhD
Sullivan International Group, Inc.
125 South Wacker Drive, Suite 1180
Chicago, IL 60606
Phone: 312.443.0550 ext. 16 *
jknoepfle@onesullivan.com

Please address the above comments as you move forward with the preparation of the risk assessment. Pursuant to our discussion of the time needed to address the comments, please submit the draft HHRA no later than April 13, 2007. If you have any questions, please don't hesitate to contact me at 312-353-6564.

Sincerely,

Terese A. Van Donsel
Remedial Project Manager

cc:

~~S. Jaffess, EPA-SFD~~
~~A. Dragich, EPA-SFD~~
~~L. Johnson, EPA-ORC~~
D. Larsen, MDEQ
C. Graff, MDEQ
~~J. Knoepfle, SulTRAC~~
~~S. Gihlin, Jones Day~~
~~P. Scanlon, Scott Fetzer~~
Site File

Remedial
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Lansing P.O. BOX 30426
48909-1926
3 MT



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